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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JASON PROCTOR,
Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; DOE INDIVIDUALS
1-20, inclusive; and ROE CORPORATIONS 1-20,
inclusive,
Defendants.

CASE NO.: 2:23-cv-01513-JAD-EJY

**STIPULATION AND ~~(PROPOSED)~~
ORDER TO EXTEND DISCOVERY
DEADLINES**

First Request

COME NOW, Plaintiff, JASON PROCTOR, by and through his counsel of record, Dimopoulos Law Firm, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its counsel of record, Carmen Cooney Forbush, hereby stipulate to extend all discovery deadlines, including for the Parties to serve their disclosure of experts and expert reports for a period of approximately ninety (90) days.

1. The Parties experienced unforeseeable delays initiating discovery due to change of counsel.
2. During the course of discovery, Defendant recently disclosed an additional 3,862 pages of records on June 26, 2024 that are at the crux of several claims and defenses asserted herein that must be reviewed and analyzed by experts on each side before the upcoming expert disclosure deadlines.
3. The Parties are actively discussing resolution and may need to engage in a second mediation to resolve this matter.
4. The Parties need additional time to resolve this matter before engaging in costly expert discovery.



5. The Parties hereby stipulate to the proposed discovery deadlines:

Deadline	Old Date	New Date
Initial Expert Disclosures	August 19, 2024	November 19, 2024
Rebuttal Expert Disclosures	September 18, 2024	December 19, 2024
Discovery Cut-off	October 18, 2024	January 16, 2025
Dispositive Motion Deadline	November 15, 2024	February 15, 2025

DATED this 30th day of July, 2024

DIMOPOULOS LAW FIRM

/s/ Michael L. Shirts

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Attorneys for Defendant State Farm

Mutual Automobile Insurance Company

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ORDER

The Court, having considered the Parties' Stipulation to Extend Time for Discovery, and good cause appearing, hereby ORDERS that Discovery deadlines be continued as follows:

Deadline	Old Date	New Date
Initial Expert Disclosures	August 19, 2024	November 19, 2024
Rebuttal Expert Disclosures	September 18, 2024	December 19, 2024
Discovery Cut-off	October 18, 2024	January 16, 2025
Dispositive Motion Deadline	November 15, 2024	February 15, 2025

IT IS SO ORDERED.

Dated this 8th day of August, 2024.

By Elayna J. Youcah
Hon. Elayna J. Youcah
U.S. Magistrate Judge

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